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28 *Bard Peripheral Vascular, Inc.*

22 UNITED STATES DISTRICT COURT

23 DISTRICT OF ARIZONA

24 In Re Bard IVC Filters Products Liability
25 Litigation

26 No. MD-15-02641-PHX-DGC

27 **PARTIES' JOINT SUBMISSION OF**
28 **DISCOVERY PROTOCOL FOR**
BELLWETHER GROUP 1

1 In accordance with the Parties' Joint Status Report for the May 3, 2017 Case
 2 Management Conference ("Joint Report"), the Parties have met and conferred regarding
 3 discovery protocols for Bellwether Group 1. The parties largely agree on the contents of
 4 the proposed case management order for the discovery protocols but have some discrete
 5 disagreements. As set forth in the Joint Report, the parties have submitted competing
 6 forms of the proposed protocol. The Parties have indicated the differences in their
 7 respective protocols by the use of underlining. Plaintiffs' proposed form of case
 8 management order is attached as Exhibit A; Defendants' proposed form of case
 9 management order is attached as Exhibit B.

10 RESPECTFULLY SUBMITTED this 3rd day of May, 2017

11 GALLAGHER & KENNEDY, P.A.

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13 By: s/ Paul L. Stoller

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27 Certificate of Service

28 I hereby certify that on this 3rd day of May, 2017, I electronically transmitted the
 29 attached document to the Clerk's Office using the CM/ECF System for filing and
 30 transmittal of a Notice of Electronic Filing.

28 /s/Deborah Yanazzo
 29 Deborah Yanazzo